

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

William Martin Kitchin
Debtor 1

Rushmore Loan Management Services, LLC, as servicer
for US Bank, National Association, not in its individual
capacity but solely as trustee for RMTP Trust, Series 2021
BKM-TT

Movant(s)

v.

William Martin Kitchin

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:18-BK-00057-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 46

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), William Martin Kitchin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Paragraph 7 contains a conclusion of law to which no response is required.
8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Admitted.
10. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
11. Paragraph 11 is omitted from the original pleading.
12. Admitted.
13. Admitted.

14. Paragraph 14 contains a conclusion of law to which no response is required.
15. Paragraph 15 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: August 9, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, August 9, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Lauren Moyer, Esquire
FRIEDMAN VARTOLO, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire